

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
)	
Field Repair Requirements for)	
Commercially-Built Transmitter)	RM-10412
And Transceiver Equipment for)	
The Amateur Radio Service)	
)	

Comments in Opposition to
Petition by Nicklaus E. Leggett, N3NL Amateur Radio Operator

Introduction

These comment are filed by Carl Swanson, an Extra class Amateur Radio operator from Thousand Oaks, California. Mr. Swanson is a professional broadcast engineer in Los Angeles, California, and holds several certifications within the commercial radio broadcast industry. Mr. Swanson also currently holds a valid General Radiotelephone Operator's License with Ship Radar endorsement, and as such feels he is suitably qualified to comment on the Petition for Rulemaking captioned above.

General Comments

Mr. Leggett is attempting, with the filing of this petition, to "hobble" the commercial amateur radio equipment industry by suggesting that the Commission invent special rules for the design of amateur radio transmitters & transceivers, just so that Mr. Leggett can quickly strip down and field repair a transceiver in the middle of an

emergency. Such a situation is completely unwarranted, and if such technical rules could even be adopted, would lead to drastically less equipment available for sale to amateur radio licensees.

The amateur radio service and its licensees

The Amateur Radio Service is much more than a technical service. 70 years ago, equipment was nowhere near as readily available as it is in the 21st century, and the population of the amateur service reflected that fact. Nowadays, with over a half-dozen commercial manufacturers designing and marketing amateur service transceivers, more and more of the general population is embracing non-commercial radio communications in everyday use. Mr. Leggett has to remember that not all licensees are technically schooled. Many licensees enjoy the art of communication in itself, & either don't understand or cannot be bothered with "how" the radio works, just that it "does".

47CFR97.1 and the state of new Amateur Radio transceivers

Mr. Leggett, in his Petition, failed to explain exactly how the amateur service rules are harmed by the apparent "resistance" of commercially built transceivers to attempts at field repair. In fact, if this petition is adopted, just the opposite effect will occur.

By comparing the commercial and amateur product lines of any of the manufacturers of two way transceivers, anyone can plainly see that amateur radio transceivers are a spin off of their own respective commercial product lines. An extension of this logic would suggest that if rules were implemented that specified drastic changes be made to amateur service transceivers alone, the manufacturers would simply drop those models from their product lines.

There is no incentive for commercial radio manufacturers to make such changes to JUST their ham radio gear. And depending on the “QRP” community to fill the gap from departing commercial firms is much like hoping that diet soda will fill the gap for regular cola when it is regulated out of existence. Simply put, the commercial amateur radio industry and the kit-based, homebuilt QRP industry simply cannot be compared.

Conclusion

I find it hard to believe that Mr. Leggett’s petition was even accepted for filing. The entire concept that Mr. Leggett proposes is laughable and should be dismissed out of hand. As the Amateur Service advances, so does technology in general. The amateur radio operator of today should have the interest to keep up with technology, if he or she so chooses. If they do not wish to keep up with the technology at the time, they have the option to send their radios out to be repaired by personnel with the training and competence necessary to fix the equipment. Does Mr. Leggett also propose that the government also “wind the clock back” for the automobile industry so that cars are once again as field-repairable as they were in the 60’s and 70’s?

I believe that Mr. Leggett and the Commission have better things to do with their time that enact short sighted and ill conceived rules that will only reduce the wide array of amateur products that are available today.